

Stoneridge. Inc. **Conflict Minerals Policy**

The Democratic Republic of the Congo (DRC) is a Central African country with vast mineral wealth, including reserves of cassiterite (tin), columbite-tantalite (tantalum), wolframite (tungsten) and gold. For many years, armed groups have fought to control mines within the DRC and have benefited financially from the proceeds of mineral trade; those armed groups have been cited for committing violent crimes against locals and perpetrating human rights abuses. As a result, these minerals are also known as “conflict minerals.” In response to violence and human rights violations in the DRC and adjoining countries (the “Conflicts Region”) related to mining of Conflict Minerals, part of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank)(July 2010) requires all U.S. public companies and to disclose the chain of custody usage of “conflict minerals”. As required by Dodd-Frank the U.S. Securities and Exchange Commission (SEC) adopted rules to implement conflict mineral reporting and disclosure requirements. The rules require manufacturers who file reports with the SEC, like Stoneridge, to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

Stoneridge understands this legislation and SEC regulation, and it is Stoneridge’s policy to avoid the use of conflict minerals mined from the Conflicts Region that directly or indirectly finance or benefit armed groups in this area. Stoneridge has adopted standards in line with the Organisation for Economic Cooperative and Development (OECD) Standard of Diligence regarding our process to obtain chain of custody declarations from all suppliers ensuring transparency in our supply chain. Stoneridge acquires and uses conflict minerals from sources worldwide. Stoneridge’s desire is not to eliminate those originating in the DRC and adjoining countries. However, Stoneridge expects the products it purchases from Stoneridge’s suppliers to be “DRC conflict free.” It is, therefore, Stoneridge’s policy that tin, tantalum, tungsten and gold contained in our products shall not be derived from sources that finance or benefit armed groups in the Conflicts Region.

Stoneridge expects its suppliers to:

- source materials from socially responsible suppliers;
- comply with Dodd-Frank regulations and provide all necessary declarations including passing this requirement through their supply chains and determine the source of specified conflict minerals; and
- be compliant with these requirements; any non-compliance shall be reviewed by our purchasing managers for future business.

Stoneridge is committed to adopting, widely disseminating and incorporating principles in support of this policy in contracts, agreements and/or communications with suppliers. Stoneridge expects its suppliers to have in place policies and due diligence measures to facilitate the sourcing of minerals that are “DRC conflict free.”

Pursuant to this policy, Stoneridge will also:

- Conduct due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflicts Region and encourage our suppliers to conduct due diligence with their suppliers.
- Require all suppliers to Stoneridge to document their efforts to determine the source and provide Stoneridge with evidence as to the origin of any tantalum, tin, tungsten and gold in materials to be supplied to Stoneridge.